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CLERK US DISTRICT COURT
DISTRICT OF ARIZONA

CR22-00462 TUC-JGZ(LAB)

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

United States of America,
Plaintiff,

v.

1. Donovan John Hale,
(Counts 1-3)
2. Brian Tackett,
(Counts 1-3)

Defendants.

INDICTMENT

VIOLATIONS:

8 U.S.C. § 1324(a)(1)(A)(v)(I)

8 U.S.C. § 1324(a)(1)(A)(ii)

8 U.S.C. § 1324(a)(1)(B)(i)

8 USC 1324 (a)(1)(B)(iii)

(Conspiracy to Transport Illegal Aliens
for Profit Placing in Jeopardy the Life of
Any Person)

Count 1

8 U.S.C. § 1324(a)(1)(A)(ii)

8 U.S.C. § 1324(a)(1)(B)(i)

8 U.S.C. § 1324 (a)(1)(B)(iii)

(Transportation of Illegal Aliens for
Profit Placing in Jeopardy the Life of
Any Person)

Counts 2-3

THE GRAND JURY CHARGES:

COUNT 1

From a date unknown to on or about January 19, 2022, in the District of Arizona, Donovan John Hale and Brian Tackett, did knowingly and intentionally combine, conspire, confederate, and agree together and with various other persons known and unknown to the grand jury, to transport and move illegal aliens, including Fatima De Jesus Figueroa-Gomez and Ramon Mata-Miranda, within the United States by means of transportation or otherwise, in furtherance of such violation of law, and did so for the

1 purpose of commercial advantage or private financial gain, and during and in relation to
2 which the defendant caused serious bodily injury to or placed in jeopardy the life of any
3 person, all in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I),
4 1324(a)(1)(A)(ii), 1324(a)(1)(B)(i) and 1324(a)(1)(B)(iii).

5 **COUNT 2**

6 On or about January 19, 2022, in the District of Arizona, Donovan John Hale and
7 Brian Tackett, knowing and in reckless disregard of the fact that an alien, Fatima De
8 Jesus Figueroa-Gomez, had come to, entered and remained in the United States in
9 violation of law, did transport and move said alien within the United States by means of
10 transportation or otherwise, in furtherance of such violation of law, and did so for the
11 purpose of commercial advantage and private financial gain, and during and in relation
12 to which the defendant caused serious bodily injury to or placed in jeopardy the life of
13 any person, in violation Title 8, United States Code, Sections 1324(a)(1)(A)(ii),
14 1324(a)(1)(B)(i) and 1324(a)(1)(B)(iii) and Title 18, United States Code, Section 2.

15 **COUNT 3**

16 On or about January 19, 2022, in the District of Arizona, Donovan John Hale and
17 Brian Tackett, knowing and in reckless disregard of the fact that an alien, Ramon Mata-
18 Miranda, had come to, entered and remained in the United States in violation of law, did
19 transport and move said alien within the United States by means of transportation or
20 otherwise, in furtherance of such violation of law, and did so for the purpose of
21 commercial advantage and private financial gain, and during and in relation to which the
22 defendant caused serious bodily injury to or placed in jeopardy the life of any person, in

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1 violation Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(B)(i) and
2 1324(a)(1)(B)(iii) and Title 18, United States Code, Section 2.

3
4 A TRUE BILL

5 /s/

6 FOREPERSON OF THE GRAND JURY
7 Dated: March 16, 2022

8 GARY M. RESTAINO
9 United States Attorney
District of Arizona

REDACTED FOR
PUBLIC DISCLOSURE

10 /s/

11 MICAH SCHMIT
12 Assistant U.S. Attorney